

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

RED RIVER TALC LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No. 24-90505 (CML)

**AGENDA FOR MATTERS SET FOR HYBRID HEARING  
ON NOVEMBER 12, 2024 AT 1:00 P.M. (PREVAILING CENTRAL TIME)**

TO THE HONORABLE CHRISTOPHER M. LOPEZ:

The above-captioned debtor (the “Debtor”) files this Agenda of matters set for *hybrid hearing* on **November 12, 2024 at 1:00 p.m. (prevailing Central Time)** before the Honorable Judge Christopher M. Lopez, United States Bankruptcy Judge, Courtroom 401, 4th Floor, 515 Rusk Street, Houston, Texas 77002:

**A. Motions.**

- 1. Debtor’s Emergency Motion to Compel Coalition Law Firms to Produce Documents in Response to Debtor’s Requests for Production Regarding the Firms’ Authority to Cast Votes [Dkt. 368] (the “Motion to Compel Vote Discovery”).**

**Status:** This matter is going forward.

**Related Documents:**

- (a) Notice of Hearing on the Motion to Compel Vote Discovery [Dkt. 381].
- (b) The Coalition of Counsel for Justice for Talc Claimants Objection to the Motion to Compel Vote Discovery [Dkt. 487].
- (c) Beasley Allen Joinder to the Coalition of Counsel for Justice for Talc Claimants Objection to the Motion to Compel Vote Discovery [Dkt. 488].

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<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 8508. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

2. **Debtor’s Emergency Motion to Compel Beasley Allen and the Coalition of Counsel for Justice for Talc Claimants to Respond to Debtor’s First Set of Requests For Production of Documents [Dkt. 445] (the “Motion to Compel”).**

**Status:** This matter is going forward.

**Related Documents:**

- (a) Notice of Hearing on the Motion to Compel [Dkt. 477].

3. **Motion of the Coalition of Counsel for Justice for Talc Claimants Pursuant to Bankruptcy Rules 9023 and 9024 to Alter or Reconsider the Order Denying Motions to Transfer Venue [Dkt. 321] (the “Venue Motion”).**

**Status:** This matter is going forward.

**Related Documents:**

- (a) The Debtor’s Objection to the Venue Motion [Dk. 330].
- (b) The Coalition of Counsel for Justice for Talc Claimants Reply in Support of the Venue Motion [Dkt. 333].
- (c) Joinder of the Ad Hoc Committee of Supporting Counsel to the Debtor’s Objection to the Venue Motion [Dkt. 358].

4. **Amended Motion of the Coalition of Counsel for Justice for Talc Claimants to Establish a Protocol for the Appointment of a Future Claims Representative [Dkt. 51] (the “Coalition FCR Motion”).**

**Status:** This matter is going forward.

**Related Documents:**

- (a) Debtor’s Motion for An Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants [Dkt. 318] (the “Motion to Appoint Ellis”).
- (b) United States Trustee’s Motion for an Order Establishing a Protocol for the Appointment of a Future Claimants’ Representative [Dkt. 301] (the “UST FCR Motion”).
- (c) Debtor’s Omnibus Objection to the Motions to Establish a Protocol for the Appointment of a Future Claims Representative [Dkt. 451] (the “Debtor’s Objection to FCR Motions”).
- (d) Joinder of the Ad Hoc Committee of Supporting Counsel to the Debtor’s Objection to FCR Motions [Dkt. 455] (the “AHC Joinder”).

- (e) Response of the Official Committee of Talc Claimants to FCR Motions [Dkt. 479] (the “TCC Response”).
- (f) Coalition of Counsel for Justice for Talc Claimants (I) Objection to the Debtor’s Motion for an Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants and (II) Reply in Further Support of the Coalition FCR Motion [Dkt. 483] (the “Coalition Objection and Reply”).
- (g) The Debtor’s Reply in Support of the Motion to Appoint Ellis [Dkt. 486] (the “Debtor’s Reply”).

**5. United States Trustee’s Motion for an Order Establishing a Protocol for the Appointment of a Future Claimants’ Representative [Dkt. 301] (the “UST FCR Motion”).**

**Status:** This matter is going forward.

**Related Documents:**

- (a) The Coalition FCR Motion
- (b) The Motion to Appoint Ellis.
- (c) Notice of Hearing on UST FCR Motion [Dkt. 373].
- (d) The Debtor’s Objection to FCR Motions.
- (e) The AHC Joinder.
- (f) The TCC Response.
- (g) The Debtor’s Reply.

**6. Debtor’s Motion for An Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants [Dkt. 318] (the “Motion to Appoint Ellis”).**

**Status:** This matter is going forward.

**Related Documents:**

- (a) The Coalition FCR Motion.
- (b) The UST FCR Motion.
- (c) Amended Notice of Hearing on Debtor’s FCR Motion [Dkt. 370].
- (d) The AHC Joinder.

- (e) Objection of Century and Certain Other Insurers to Debtor's Motion to Appoint Ellis [Dkt. 456].
- (f) The TCC Response.
- (g) The United States Trustee Objection to the Motion to Appoint Ellis [Dkts. 480, 481].
- (h) Opposition of Tamara Newsome to the Motion to Appoint Ellis [Dkt. 482].
- (i) The Coalition Objection and Reply.
- (j) The Debtor's Reply.

**B. Related Documents**

- 1. With respect to the Venue Motion, the Debtor incorporates by reference and relies on the Debtor's Witness and Exhibit List [Dkt. 324].
- 2. The United States Trustee Witness and Exhibit List [Dkt. 458].
- 3. The Debtor's Witness and Exhibit List [Dkt. 460].
- 4. The Ad Hoc Committee of Supporting Counsel Witness and Exhibit List [Dkt. 462].
- 5. Tamara Newsome Witness and Exhibit List [Dkt. 466].
- 6. Corrected Century's and Certain Other Insurers' Witness and Exhibit List [Dkt. 472].
- 7. Coalition of Counsel for Justice for Talc Claimants Witness and Exhibit List [Dkt. 473].
- 8. The Debtor Supplemental Witness and Exhibit List [Dkt. 489].

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Dated: November 11, 2024  
Houston, Texas

Respectfully submitted,

/s/ John F. Higgins

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PROPOSED ATTORNEYS FOR DEBTOR

**Certificate of Service**

I certify that on November 11, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas, and will be served as set forth in the Affidavit of Service to be filed by the Debtor's claims, noticing and solicitation agent.

/s/ John F. Higgins

John F. Higgins